



Gregory P. Korn

Direct Dial: (310) 566-9807

Direct Fax: (310) 566-9877

E-Mail: gkorn@khiks.com

File Number: 30021-00002

August 4, 2025

VIA ECF

The Honorable Jeannette A. Vargas
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007
(212) 805-0210

Re: ***Drew Dixon v. Antonio Marquis “L.A.” Reid, 1:23-cv-09878-JAV***
Letter Motion for Leave to File Redacted Reply Memorandum Under Seal

Dear Judge Vargas:

In accordance with Section 6 of the S.D.N.Y. Electronic Case Filing Rules and Instructions, Defendant Antonio Marquis “L.A.” Reid (“Defendant”) seeks leave to file a redacted version of Defendant’s Opposition to Plaintiff’s Motions in Limine (the “Opposition”). Defendant also seeks leave to file under seal the following documents, attached to the Declaration of Gregory P. Korn in support of the Opposition (“Korn Decl.”):

Exhibit 1 to the Korn Decl., which is an excerpt from a book draft written by Plaintiff Drew Dixon (“Plaintiff”); and

Exhibit 2 to the Korn Decl., which is an excerpt from the transcript of an interview with Plaintiff.

Exhibits 1 and 2 are documents which were designated by Plaintiff as “Confidential” pursuant to the April 23, 2024 Protective Order in this action (ECF 44). The information that Defendant seeks to redact from the Opposition either describes the documents contained in Exhibits 1 and 2, describes other documents and/or testimony designated as “Confidential” by Plaintiff in discovery, or discusses information set forth in Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motions in Limine (ECF 183), which was redacted and the subject of Plaintiff’s Letter Motion for Leave to file Redacted Motion and Exhibits Under Seal (ECF 178).

We thank the Court for its attention to this matter.

The Honorable Jeannette A. Vargas
August 4, 2025
Page 2

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'G. Korn', written over a horizontal line.

Gregory P. Korn (*pro hac vice*)

Shawn Holley (*pro hac vice*)

Suann C. MacIsaac (*pro hac vice*)

**KINSELLA HOLLEY ISER KUMP STEINSAPIR
LLP**

11766 Wilshire Boulevard, Suite 750

Los Angeles, CA 90025

310-566-9822

gkorn@khiks.com

sholley@khiks.com

smacisaac@khiks.com

*Attorneys for Defendant Antonio Marquis
"L.A." Reid*

30021-00002/912182.1